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PROCOPIO, CORY, HARGREAVES &
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San Diego, CA 92101
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Attorneys for Defendants Gulab Moorjani, Seema Moorjani,
Sunil Moorjani, and Zubeida Moorjani

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

DEEPAK MOORJANI,

Plaintiff,

v.

FLORADELIZA MOORJANI; GULAB
MOORJANI; JASWANT MOORJANI; SEEMA
MOORJANI; SUNIL MOORJANI; ZUBEIDA
MOORJANI,

Defendants.

Case No. 37-2021-00033119-CU-OR-CTL

**STIPULATION AND [PROPOSED]
ORDER TO FILE FIRST AMENDED
COMPLAINT**

Dept: C-65
Judge: Hon. Ronald F. Frazier

Complaint Filed: August 4, 2021
Trial Date: Not yet set

"IMAGED FILE"

Plaintiff DEEPAK MOORJANI ("Plaintiff") and Defendants GULAB MOORJANI,
SEEMA MOORJANI, SUNIL MOORJANI, and ZUBEIDA MOORJANI (hereinafter,
"Defendants"), though their counsel, hereby stipulate as follows:

1. WHEREAS, on August 4, 2021, Plaintiff filed a Complaint to: (a) Quiet Title; (b)
Cancellation of Instrument; and (c) Partition and Forced Sale;

2. WHEREAS, the parties met and conferred regarding Defendants' intended demurrer
to the Complaint;

3. WHEREAS, Plaintiff has agreed to file a First Amended Complaint no later than
November 23, 2021;

4. WHEREAS, as a result of Plaintiff's agreement to file a First Amended Complaint,
the parties agree that Defendants have no obligation to respond to the Complaint.

1 5. The parties agree that the execution of this stipulation shall not constitute a waiver of
2 any party's rights, interests or remedies relating to the prosecution or defense of the above action.

3 6. The parties agree that the execution of this stipulation shall not be construed as an
4 admission of liability on the part of Defendants, or any of them, as to any portions of the Complaint
5 or First Amended Complaint.

6 7. This stipulation may be executed electronically and electronic signatures may be used
7 in lieu of originals.

8 SO STIPULATED.

9
10 DATED: October 22, 2021

WRIGHT & SUPPLE LLP

11
12 By: 

Oriet Cohen-Supple
Mary Wright
Attorneys for Plaintiff Deepak Moorjani

13
14
15 DATED: October 22, 2021

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

16
17
18 By: 

John D. Alessio
Zagros S. Bassirian
Attorneys for Defendants Gulab Moorjani,
Seema Moorjani, Sunil Moorjani, and
Zubeida Moorjani

19
20
21 **ORDER**

22 Based on the stipulation of the parties, and good cause appearing, the Court issues the
23 following Order:

- 24
- 25 1. Plaintiff shall file a First Amended Complaint on or before November 23, 2021.
 - 26 2. Defendants have no obligation to respond to the current Complaint filed on August 4,
27 2021.

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3. The execution of this stipulation shall not constitute a waiver of any party's rights, interests or remedies relating to the prosecution or defense of the above action.
4. The execution of this stipulation shall not be construed as an admission of liability on the part of Defendants, or any of them, as to any portions of the Complaint or First Amended Complaint.

Dated: _____

Hon. Ronald F. Frazier, Judge of the Superior Court

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is PROCOPIO, CORY, HARGREAVES & SAVITCH LLP, 525 "B" Street, Suite 2200, San Diego, California 92101. On October 25, 2021, I served the within documents:

STIPULATION AND [PROPOSED] ORDER TO FILE FIRST AMENDED COMPLAINT

- ☐ **BY U.S. MAIL** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.
- ☐ **BY ELECTRONIC MAIL SERVICE** based upon court order or an agreement of the parties to accept service by electronic transmission, by electronically mailing the document(s) listed above to the e-mail address(es) set forth below, or as stated on the attached service list and/or by electronically notifying the parties set forth below that the document(s) listed above can be located and downloaded from the hyperlink provided. No error was received, within a reasonable time after the transmission, nor any electronic message or other indication that the transmission was unsuccessful.
- ☒ **BY ELECTRONIC SERVICE (via One Legal Online Court Services):** I served upon the designated recipients via electronic transmission through the One Legal system on October 25, 2021. Upon completion of said transmission of said documents, a certified receipt is issued to filing party acknowledging receipt by One Legal's system. Once One Legal has served all designated recipients, proof of electronic service is returned to the filing party.

Oriet Cohen-Supple, Esq.
Mary Wright, Esq.
Wright & Supple LLP
600 Key Route Blvd.
Albany, CA 94706-1423
Telephone: (510) 495-5749

Email: oriet@wrightandsupple.com
Email: mary@wrightandsupple.com

Attorneys for Plaintiff Deepak Moorjani

- ☒ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 25, 2021, at San Diego, California.


Melissa Avitia Turpin

②

Daiki Kajino/db/dbcom
2007/05/09 19:19

To Tomohiko Kimura/Tokyo/DBJapan/DeuBa@DBAPAC

cc

bcc

Subject Fw: Staff - Privileged & Confidential

Kimura-san

As we discussed in this morning, I explained the current situation to Murakami-san in HR. After that, I arranged conference call with Sunil Madan and it is already fixed on tomorrow at 17:00 (Tokyo Time).

Murakami-san and I will have a conference call with him and ask him about our concerns. If you need to join it, please let me know.

As to investigation of Frank's e-mail for Pipeline issue, I will start it as soon as I obtain Mitch's approval.

Regards,

☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆
Daiki Kajino (梶野 大毅)
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Tel : +81-3-5156-7738
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daiki.kajino@db.com
☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆

----- Forwarded by Daiki Kajino/db/dbcom on 2007/05/09 19:13 -----

①

Mark
Grolman/Sydney/DBAustralia
/DeuBa@DBAPAC
2007/05/09 19:09

To "Dick Walker" <richard.h.walker@db.com>,
janice.reznick@db.com, rachel.blanshard@db.com,
jiana.leung@db.com, "Kiyoshi Murakami"
<kiyoshi.murakami@db.com>, "Andrew Hume"
<andrew.hume@db.com>, "Daiki Kajino" <daiki.kajino@db.com>,
"Mr. Tomohiko (Tom) Kimura" <tomohiko.kimura@db.com>

cc

Subject Staff - Privileged & Confidential

PRIVILEGED & CONFIDENTIAL

Below are draft notes of the interview I had with Frank Forelle yesterday.

NEXT STEPS

I suggest for your consideration that the next steps should be:

- (a) we interview Sunil Madan. Tom Kimura has agreed to do that by telephone as soon as possible this week;
- (b) when Deepak Moorjani returns to Tokyo from the US next week, we press him again to produce all evidence he has of any alleged violations or wrongdoing. In the two weeks since he was interviewed he has not produced any evidence;
- (c) agree a letter to Mr Moorjani in response to his letter. I suggest that this letter be signed by David Hatt as President and CEO of DSI (the employer of Mr Moorjani). David Hatt has been briefed on this matter. I will draft the response letter for your review. Once agreed, that letter should be delivered to Mr Moorjani.

I also propose giving the draft notes of meeting to Frank Forelle to check for accuracy.

Thursday, May 20, 2021

memorandum

to: Dr. Zubie Moorjani
from: Deepak Moorjani

cc: Ashok Kulnarni
cc: Gul Moorjani
cc: Jas Moorjani
cc: Jennifer Compton
cc: Karen Denune
cc: Lisa Stout
cc: Lynn Balshone Jacobs
cc: Manisha Moorjani
cc: Martin Rowbottom
✓ cc: Maureen Zdanowicz
cc: Moti Moorjani
cc: Pamela Salem O'Hagan
cc: Rosemarie Osowik
to: Seema (Kulkarni) Moorjani
cc: Sue Stolar
cc: Sueja Kummar
cc: Suneel Kulkarni
cc: Susan Rita Feierman Solomon
cc: Tyler Chapman

Hi Mom,

I forgive you for your poor behavior, and I love you unconditionally. I would like you to participate in your own rescue.



Jim Maser

From: profferg <profferg@aol.com>
Sent: Wednesday, October 13, 2021 11:15 PM
To: Jim Maser
Subject: Re: referral

Hi Jim. It's great to hear from you, as always. It would be great to see you again. We're leaving 10/20 for 3 weeks in Italy, but will be back 11/12--so anytime after that.

Re: your friends: the first thing to do is to report the situation to Adult Protective Services in the County in which the parents live. Here are the links for Alameda and Contra Costa Counties, respectively:

<https://www.alamedacountysocialservices.org/our-services/Abuse-and-Protection/adult-and-senior-abuse/index>

<https://www.contracosta.ca.gov/914/Adult-Protective-Services>

Re an attorney to help: I'd suggest you contact Kathryn Korn in Orinda. Here's the link to her website:

<https://www.kornlawgroup.com/>

I hope this helps. Let me know if you have other questions.

Warmest regards, Mike

-----Original Message-----

From: Jim Maser <Jim.Maser@picanteberkeley.com>
To: profferg <profferg@aol.com>
Sent: Wed, Oct 13, 2021 6:28 am
Subject: referral

Hey Mike,

Hope all is well with you and your family.

I am beginning to remodel Picante today. Not sure how all this will roll out.

Do you have a referral for a lawyer who specializes in elder care abuse?
Parents I know have kids who are bad actors, and they need help.

Thanks, and I hope it's sooner than later that I see you again.

Best,
Jim



Wright & Supple LLP

660 Key Route Blvd. Albany, CA 94706

Mary (650) 248-6490 | Oriet (510) 495-5749

mary@wrightandsupple.com | oriet@wrightandsupple.com

ACCOUNT STATEMENT

Prepared for:
Deepak Moorjani

RE:
1082-200 (Family Dispute)

Previous Balance	\$0.00
Current Charges	\$5,700.00
From Retainer	\$5,700.00
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$5,700.00
Total Amount	\$0.00



Wright & Supple LLP

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 Mary (650) 248-6490 | Oriet (510) 495-5749
mary@wrightandsupple.com | oriet@wrightandsupple.com

INVOICE

Deepak Moorjani

Invoice Date November 10, 2021

Invoice Number 10001

Invoice Amount \$4,500.00

Matter: 1082-200 (Family Dispute)

ATTORNEY'S FEES

10/11/2021	Review complaint and client's end goals memo in preparation to discuss with opposing counsel (0.7); call with opposing counsel to further discuss (0.5); email to the client re same (0.1); call with J. Belote to discuss co-counsel to advise on the factual and legal basis of the claims (0.1)	2.0	1.00	\$500.00
10/12/2021	Call with the client to discuss strategy moving forward (0.5); amending the complaint to address fatal deficiencies and plead valid claims to leverage for mediation and recommendation to hire J. Belote for representation in real estate claims (0.5); call with J. Belote to further discuss and set up a call with the client and J. Belote (0.1; no charge; call with J Belote and the client to further discuss (0.5); a follow up call with J. Belote to discuss initial analysis of type of claims that can be pleaded (0.2); follow up call with the client to discuss engaging elder abuse attorney to amend the complaint (0.2)	2.0	1.00	\$500.00

10/13/2021	Review and exchange emails with ZAG re client's mother's whereabouts and forward to the client with comments	0.00	0.00	\$1,200.00
10/18/2021	Calendar deadlines to respond to opposing counsel re amending the complaint and last day to respond to current complaint and call with the client to discuss timeline of filing responding pleading to amendment complaint and finding elder abuse lawyer	0.00	0.00	\$1,500.00
10/21/2021	Exchange emails with the client re new deadline to file amended complaint in preparation to communicate with opposing counsel re same and exchange emails with opposing counsel and follow up with the client re same	0.00	0.00	\$1,500.00
10/23/2021	Review revise and email to opposing counsel stipulation extension of time to file answer to amended complaint and communicate with the client re same including drafting proposal as requested	0.00	0.00	\$1,500.00
10/27/2021	Review client's settlement proposal and communicate by email and call course of action to make such proposal only after amendment complaint is on file	0.00	0.00	\$1,200.00
SUBTOTAL				\$4,900.00

COSTS

SUBTOTAL	\$0.00
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MATTER LEDGERS

11/9/2021	Balance before last invoice	\$0.00
11/9/2021	Invoice 10931	\$4,900.00
SUBTOTAL		\$4,900.00

TRUST ACCOUNT

11/9/2021	Previous Balance	\$0.00
AVAILABLE IN TRUST		\$0.00

a memo from the desk of
Deepak Moorjani

Thursday, October 27, 2022

to: Jennifer W. Sherman, The Edible Schoolyard Project
to: James Maser, Picante Berkeley

cc: Alex Wynaendts, Deutsche Bank
cc: Julia R. Bates, Lucas County Prosecutor
cc: Laura Waters Maser
cc: Summer Stephan, San Diego County District Attorney

subject: Signed Affidavits

This package includes signed affidavits by Frank Forelle (Deutsche Bank) and Steve Adang (Deutsche Bank), and these signed affidavits contain admissions of criminal activity at Deutsche Bank.

Please confirm your possession of these signed affidavits with Alex Wynaendts of Deutsche Bank by November 30, 2022.

Thank you for your kind attention.

.....

Event Report

Event ID: 2023-024092

Call Ref #: 931

Date/Time Received: 03/06/23 13:00:57

Rpt #:	Call Source: PHONE	Prime 152 Unit: WHITMORE, TRAVIS M	Services Involved			
			LAW			
Location: 500 RIVERSIDE DR						
X-ST:	EAGLE POINT DR		Jur: WCS	Service: LAW	Agency: ROSS	
	EAGLE POINT DR		St/Beat: ROSS	District: NRTH	RA: 620	
Business:		Phone: () -			GP: ROSS	
Nature: SUSPICIOUS INCIDENT	Alarm Lvl: 1	Priority: 2	Medical Priority:			
Caller: MOORJANI,DEEPAK				Alarm:		
Addr: 500 RIVERSIDE DR	Phone: (508) 704-1111			Alarm Type:		
Vehicle #:	St:	Report Only: No	Race:	Sex:	Age:	
Call Taker: NVAUGHAN	Console: 5004					
Geo-Verified Addr.: Yes		Nature Summary Code:	Disposition: COMP	Close Comments:		
<p>Notes: CONTACTED 173 AND ADVISED THAT THE INCIDENT OCCURRED BETWEEN 1970 AND 1998 [03/10/23 12:16:43 JVARGAS]</p> <p>SPOKE WITH CALLER AND HE ADVISED HE WANTED A REPORT REGARDING DOMESTIC VIOLENCE FOR 1970-1990. CALLER STATED FATHER USED TO BEAT MOTHER. CALLER ADVISED HE IS CURRENTLY TRYING TO REPORT ELDER ABUSE FOR HIS MOTHER SINCE HIS BROTHER WONT LET HER LIVE IN HER HOUSE IN CALIFORNIA. CALLER STATED HE WANTED A REPORT TO SHOW A PATTERN OF ABUSE. CALLER LIVES IN CALIFORNIA, MOTHER LIVES IN CALIFORNIA, AND FATHER LIVES IN FLORIDA. I ATTEMPTED TO CALL THE MOTHER AND DID NOT GET AN ANSWER. I THEN SPOKE WITH FATHER AND HE DENIED ALL ALLEGATIONS.</p> <p>NFI. [03/06/23 14:01:23 Unit:152]</p> <p>REPORTING DOMESTIC VIOLENCE BETWEEN MOTHER AND FATHER THAT HAPPENED IN THE 70s 80s AND 90s. CALLER AND MOTHER ARE IN DIFFERENT CITIES IN CALIFORNIA. FATHER IS IN FLORIDA. SEEKING REPORT AT THE ADVICE OF LEGAL COUNSEL FOR A PROTECTIVE ORDER. [03/06/23 13:04:55 NVAUGHAN]</p>						

Times

Call Received: 03/06/23 13:00:57	Time From-Call Received		
Call Routed: 03/06/23 13:04:55	000:03:58	Unit Reaction: : :	(1st Dispatch to 1st Arrive)
Call Take Finished: 03/06/23 13:04:55	000:03:58	En-Route: : :	(1st Dispatch to 1st En-Route)
1st Dispatch: 03/06/23 13:06:18	000:05:21 (Time Held)	On-Scene: : :	(1st Arrive to Last Clear)
1st En-Route:	: :		
1st Arrive:	: :	(Reaction Time)	
Last Clear: 03/06/23 14:02:13	001:01:16		

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
152	450914	D	Dispatched	03/06/23 13:06:18	Stat/Beat: ROSS		NVAUG
152	450914	C	Cleared	03/06/23 14:02:13	COMP [COMP]	COMP	JVARGA

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
		TR	Time Received	03/06/23 13:00:57	By: PHONE		NVAUG
		ENT	Entered Street	03/06/23 13:01:18	500 RIVERSIDE DR		NVAUG

Unit	Empl ID	Type	Description	Time Stamp	Event Log	Close Code	User
					Comments		
		ENT	Entered	03/06/23 13:01:36	MOORJANI,TEEPAK		NVAUG
		ENT	Entered CallerPhone	03/06/23 13:01:44	MOORJANI,TEEPAK		NVAUG
		ENT	Entered Nature	03/06/23 13:01:50	DOMESTIC VIOLENCE		NVAUG
		CHG	Changed Nature	03/06/23 13:02:09	DOMESTIC VIOLENCE --> CIVIL		NVAUG
		VCH	Viewed Call History	03/06/23 13:03:07	Location Information		NVAUG
		ENT	Entered Remarks	03/06/23 13:04:55			NVAUG
		FIN	Finished Call Taking	03/06/23 13:04:55			NVAUG
		CHG	Changed Nature	03/06/23 13:05:29	CIVIL DISPUTE / COMPLAINT -->		NVAUG
		VEV	Viewed Event	03/06/23 13:06:13	User First Viewed Event CAD		JFLAGE
		VEV	Viewed Event	03/06/23 13:07:10	User First Viewed Event CAD		SSHAWV
		ARM	Added Remarks	03/06/23 14:01:23			Unit:152
		CHG	Changed	03/10/23 12:15:48	MOORJANI,TEEPAK -->		JVARGA
		ARM	Added Remarks	03/10/23 12:16:43			JVARGA